



**7th Meeting of the WCPFC E-reporting and E-monitoring Working Group**

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Online

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**Proposed Assurance and Audit Process for EM Standards Based on the ROP Model**

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**ERandEM IWG7\_WP5**

**18 November 2025**

**Submitted by Interim ERandEM IWG Chair**

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**ERandEM IWG *Proposed Assurance and Audit Process for EM Standards***  
***Based on the ROP Model***

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With a solid assurance and audit process, we can help enhance confidence in EM as a viable monitoring tool and ensure that data collected is aligned with the Commission's broader objectives.

How do we ensure the WCPFC EMP is providing reliable and credible data?

The ERandEM IWG has been tasked to develop an assurance and audit process based on the current assurance and audit processes used by the ROP.

- In preparation for discussion, ROP and observer language was replaced with WCPFC EMP language.
- As you review this document, consider if the ROP assurance and audit process translates effectively to the WCPFC EM
- What documentation may be required to confirm the national and sub-regional EMPs are in compliance with the WCPFC EMP's minimum standards.

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## AUTHORIZATION PROCESSES

**a. Interim Authorization** is an almost immediate authorization for active EM programs that are already operating to standards similar or better than the WCPFC EMP's minimum standards. This is not a full authorization - this can only be attained after an audit of the program is carried out by the Secretariat. Nevertheless, interim authorization allows a program to operate on behalf of the WCPFC EMP.

**b. Full Authorization** will be granted following a successful program audit by the Secretariat. From the point of full authorization being granted, the national or sub-regional program will be permitted to operate on behalf of the WCPFC EMP. Further audits of the program will be carried out by the Secretariat from time to time (approx. every 5 years) to ensure standards are being maintained.

### Interim authorization process for national and sub-regional EM programs

1. CCMs seeking authorization for their respective national EMPs to be included in the WCPFC EMP shall apply to the Secretariat declaring that their national EMP meets the WCPFC EMP's minimum standards. Upon receipt of an application from a CCM for its national EMP, or an application from CCMs in respect of a sub-regional program and based on an initial review for completeness of the application, the Secretariat will issue an interim authorization for the national EMP or sub-regional EMP program to be included in the WCPFC EMP. Interim Authorizations will be valid until a full audit is made.
2. If the Secretariat detects a deficiency in compliance with one or more of the WCPFC EMP's minimum standards, the CCM or sub-regional program shall be notified of the deficiencies. The CCM or sub-regional program will work with the Secretariat to correct the deficiencies within 90 days, or some other timeframe determined by the Secretariat in consultation with the CCM or sub-regional program concerned. Failure to correct such deficiencies may result in the removal of the interim authorization by the Secretariat.

Japan- concerned about the burden placed on the Secretariat by an initial review and a full review. Therefore, we suggest focusing the initial review on fundamental checks and replacing paragraphs 2-3 with the following text. Please note that the list of all eligible vessels may be updated from time to time, so it is neither practical nor useful to submit such a list at the time of application.

2. During an initial review, the Secretariat will review:

- If an application is submitted by a letter stating that the national EMP wishes to participate in the WCPFC EMP and declaring that the national EMP meets the minimum standards for the WCPFC EMP agreed upon by the Commission.
- If a national WCPFC EMP Coordinator is nominated.
- If an explanation of the scope of eligible vessels with EM systems in compliance with WCPFC minimum standards are supplied to the Secretariat.

US-The United States suggests the full audit should follow within a short time period of the interim authorization being granted to identify any concerns with national EM programs as quickly as possible.

3. As part of a CCM's application a national WCPFC EMP Coordinator must be nominated, and the names of all eligible vessels with EM systems in compliance with WCPFC minimum standards must be supplied to the Secretariat.

#### **Full authorization of national and sub-regional programs**

1. The Secretariat shall conduct a program audit of each national EMP and sub-regional program that receives an interim authorization to ensure that they meet the WCPFC EMP's minimum standards.
2. CCMs seeking Full Authorization will have previously been granted interim authorization. The program shall further apply to the Secretariat declaring that their national EMP meets the WCPFC EMP's minimum standards. The CCM will include relevant supporting documentation to the Secretariat to demonstrate compliance with the WCPFC EMP's minimum standards. Relevant CCMs may also nominate sub-regional observer programs to be authorized for inclusion in the WCPFC EMP through the application process.
3. If the Secretariat detects a deficiency during the program audit regarding compliance with one or more of the minimum standards, the CCM or sub-regional program shall be notified of the deficiencies. The CCM or sub-regional program will work with the Secretariat to correct the deficiencies within 90 days or some other timeframe determined by the Secretariat in consultation with the CCM or sub-regional program concerned. Failure to correct such deficiencies may result in the removal of the interim authorization.
4. Upon the successful conclusion of each program audit, the Secretariat shall authorize national EMPs and sub-regional programs to be included in the WCPFC EMP. In consultation with the relevant CCM or sub-regional program the audit organized by the Secretariat will take place as soon as practical after the interim authorization has been granted. If a CCM or sub-regional program fails to correct reported deficiencies identified during the audit, the national EMP or sub-regional program may not be authorised until such deficiencies are corrected.
5. All authorized national EMPs and sub-regional programs will be kept under continuous review by the Secretariat to ensure they meet the WCPFC EMP's minimum standards. CCMs shall ensure national EMPs and sub-regional programs are refined, as necessary, and within the agreed timeframe, to meet any further standards adopted by the Commission.

### **SUMMARY OF AUTHORIZATION PROCEDURES**

#### **Interim authorization of national EMP's**

CCMs seeking interim authorization for their national EMPs to be included as part of the WCPFC EMP should use the following as a guide.

### **Interim authorization of national EMP to participate in the WCPFC EMP**

1. Submit an application for their national program by letter stating that their national EMP program wishes to participate in the WCPFC EMP;
2. Declare that their national EMP meets the minimum standards for the WCPFC EMP agreed to by the Commission.
3. Provide a list of the names of eligible vessels with EM systems to participate in the WCPFC EMP; and

NZ-List of vessels will change as vessels enter / exit the fleet. Authorization should apply at programme level. Dependency here with annual reporting.

Japan- As pointed out above, the list of all eligible vessels may be updated from time to time. Therefore, Japan suggests following text instead:

4. Provide an explanation of the scope of eligible vessels with EM systems to participate in the WCPFC EMP; and
5. Nominate a national EMP coordinator.

### **The Secretariat will**

- a. Respond to the application, and if required will highlight any deficiencies.
- b. Work with CCM to correct any deficiencies.
- c. Grant interim Authorization if a national EMP meets the WCPFC EMP's minimum standards.
- d. Inform CCM of interim authorization.

Japan- Suggests the following text: The Secretariat will

a. Respond to the application.

b. Review

- If an application is submitted by a letter stating that the national EMP wishes to participate in the WCPFC EMP and declaring that the national EMP meets the minimum standards for the WCPFC EMP agreed upon by the Commission.
- If a national WCPFC EMP Coordinator is nominated.
- If an explanation of the scope of eligible vessels with EM systems in compliance with WCPFC minimum standards are supplied to the Secretariat.

c. Grant interim Authorization if a national EMP meets the criteria listed in b.

d. Inform CCM of interim authorization.

### **Full Authorization of national EMP to participate in the WCPFC EMP**

CCMs seeking full authorization to have their national EMP included in the WCPFC EMP will have previously been granted an interim authorization.

To attain Full Authorization CCMs shall:

1. Submit to the Secretariat an application by letter stating that they wish to attain full authorization of their national EMP.
2. Declare to the Secretariat that their national EMP meets the minimum standards for the WCPFC EMP.

3. Include relevant supporting documentation to demonstrate compliance with the minimum standards.

Chairs comments: What supporting documentation would be helpful? The ROP asks CMM's to submit the manual's observer use at sea. The focus is on the instruction given to observers to collect data at sea. Should we consider focusing on the instruction given to EM analyst since they are observers behind computer screens documenting data from EM video footage? How else can we ensure that EM analyst is accurately identifying species, is familiar with basic fishing practices and the EM review processes?

Other documentation could potentially include:

1. The list of reports generated when a vessel's EM system malfunctions. Since the interim minimum standards require vessel operators/owners to report EM system malfunctions to the appropriate contact as outlined in the Vessel Monitoring Plan as soon as is practicable, including details of the date, time, and, if possible, the geolocation when the malfunction was first detected, a list of these reports helps maintain the integrity of the monitoring program by clearly identifying when required data may be missing.

Any other suggestions for documentation?

4. Provide a list of the names of eligible vessels with EM systems to participate in the WCPFC EMP; and
5. Nominate a national EMP coordinator.
6. Agree that they will ensure national EMPs and sub-regional programs are refined, as necessary, and within the agreed timeframe, to meet any further standards adopted by the Commission.

**The Secretariat will:**

- a. Conduct a program audit of each national EMP and sub-regional program that has received an interim authorization.
- b. Ensure that the national EMP meet the WCPFC EMP's minimum standards.

**Chinese Taipei- Potentially Useful Guide to Support the Audit Process**

To better support the Secretariat and CCMs in preparing for the audit, we believe that some form of guidance materials or checklists would be helpful. For example, a self-assessment checklist that outlines all MUST elements in the current standards, along with brief explanations, could assist CCMs in evaluating their EM Programmes prior to applying for authorization.

In addition, a list of documents typically required for submission to the Secretariat would be valuable for planning and preparation.

NZ- Templates for demonstrating how a programme meets minimum requirements could standardise/simplify the auditing process. Something for ER&EM WG to develop?

- c. Notify the CCM of any deficiencies with their national EMP.
- d. Work with the CCM to correct any deficiencies within 90 days.

Japan suggests deleting this part.

Chinese Taipei- We note that a 90-day timeframe has been proposed for addressing deficiencies identified during the Audit Process. While we recognize the need for a defined period to ensure timely corrective measures, we wonder whether a uniform timeframe would be suitable for all cases.

To ensure that timelines for corrective actions are both reasonable and practical, we suggest that the audited Programme work collaboratively with the Secretariat to determine a specific timeframe for each identified implementation gap. This approach would enable the development of tailored corrective action plans, with clearly defined tasks, steps, and deadlines.

Furthermore, we find it difficult to accept that all deficiencies would necessarily result in questionable EM data quality. Removal from the list of authorized Programmes may also seem unnecessarily harsh in cases of minor deficiencies, such as insufficient workstation ergonomics for EM Analysts.

Additionally, we would appreciate clarification on the status of EM data submitted by a Programme that is removed from the authorized list. Should such data be considered questionable or even deleted from the Commission database? Since we have never encounter such incident in the implementation of WCPFC ROP, we would welcome further discussion with you and other CCMs on this matter.

- e. Fully authorize national EMPs and sub-regional programs to be included in the WCPFC EMP as each audit is successfully completed.
- f. Inform the CCM if qualified of the full authorization of their national EMP.
- g. All authorized national EMPs and sub-regional programs will be kept under continuous review by the Secretariat to ensure they continue to meet the WCPFC EMP's minimum standards.

#### **Summary of Secretariat procedure for initial and continued authorization**

1. Interim and full authorization will occur after all the procedures have been satisfied following a program audit organized by the Commission Secretariat.
2. The Secretariat will prepare an audit report and summary of their findings after reviewing minimum standards implemented by the EM program.
3. If the final summary or report indicates deficiencies in the program, the Secretariat and the program will work together to correct these deficiencies. There is a 90-day timeframe to rectify any deficiencies, but this can be extended if required and agreed by both parties.

Japan suggests deleting this part.

4. The program will be informed of the deficiencies by the executive director outlining the deficiencies in a letter to the official contacts and the national coordinator.
5. If the final summary or report indicates that there are no problems, and all minimum standards are satisfactory, then the report will be passed onto the executive director for final approval.
6. The executive director will sign a letter to be sent to the nominated persons and official contacts from the EM program being audited. The letter will indicate that the program is authorized to carry out WCPFC EMP duties on behalf of the Commission.

### **AUDITS PROCESS**

1. WCPFC4 agreed that audits are a Secretariat function and included this in [CMM 2007-01](#) (now [CMM 2018-05](#)).
2. There is an obvious need for an understanding of the role and functions that audits will play in the evolution of the WCPFC EMP, including harmonization and consistency, and standards to ensure that the operation of individual programs meet a certain standard. One of the Secretariat's roles in the audit process will be to ensure that national EMPs are collecting the required WCPFC minimum standard data fields in a harmonized manner.
3. Audits will play a role in improving the efficiency and efficacy of EM programs based on identification by auditors of areas that may require improvements.
4. The role of an audit will be to work with CCMs to review the effectiveness of their program's contribution to the WCPFC EMP. The purpose of the audit is to inform CCMs and the Commission:
  - a. Gaps in EM coverage of fleets active in the WCPO to be agreed upon by the Commission.
  - b. Gaps in respect of achieving standards agreed by the Commission.
  - c. Opportunities to harmonize the operations and activities of individual EM programs.
  - d. Identify opportunities for achieving efficiency gains among contributing EM programs; and  
Identify other matters as identified by the Commission and its subsidiary bodies.

### **Audit procedure**

1. A list of program audits and years of the past audits shall be placed on the WCPFC Website.
2. The program will be audited and confirmed to use EM for monitoring on behalf of the WCPFC EMP approximately every 5 years; Programs can request earlier audits if they wish.
3. When the program is due for an audit, the program will be contacted by the Secretariat and arrangements for an audit agreeable to both the program and the secretariat will be made.



4. Audits will generally be carried out in the face-to-face mode; however, if agreeable to the Secretariat and the CCM an online audit may be arranged.

NZ- Unclear why a visit to a vessel is required? Logistically challenging, potentially costly and introduces H&S requirements. What minimum standard would be verified through a visit that couldn't be verified through a photo / data? Verifying some system component standards (UPS, power supply, interference with electrical equipment etc.) would require technical knowledge.

NZ- Footage extremely sensitive. Not clear if showing footage to Secretariat is envisioned under the full authorisation process but is implied through visit to data centre? Suggest this is made explicit in the audit process. My two cents is that this isn't required – likely to be major sticking point and unsure in the value it would provide? A screenshot of camera field of view when not fishing (i.e. no crew in view) likely to be sufficient to determine if cameras are suitably positioned.

Japan suggests an online audit as the first option to reduce the Secretariat's workload. In this regard, we propose the following modification to paragraph 4:

4. Audits will generally be carried out online; however, if necessary and agreeable to the Secretariat and the CCM, an in-person audit may be arranged.

#### **In-person audit**

1. All newly established EM programs must be audited in a one-on-one, in-person mode.
2. Programs previously audited and asking for continuation of their WCPFC EMP status should be audited in-person, when possible, but may be audited online if this is more convenient for both parties.
3. In-person audits must occur for the first audit of a program wishing to be part of the WCPFC EMP. This is so the Secretariat can visit some of the vessels outfitted with EM systems and the data review center.

Japan- It does not seem practical to arrange such a visit within a few-day trip in Japan. So, we suggest inserting "as much as possible".

4. After this has occurred, and a review of the program after a timeframe (Approx 5 years) another in-person audit will be organized, or if requested an online audit may be used to audit the program.

NZ- Five years between full audits seems a long time. More frequent but higher-level audits could deliver greater value than more infrequent deep-dives.

5. In-person audit requires the following:
  - a. The program being advised of dates plus meeting place arrangements suitable for both parties.
  - b. Audit timing of 2/3 days is allocated; but can be extended if required.
  - c. A copy of a previous audit summary if applicable, plus a copy of the questions on the minimum standards to be asked during the audit. These should be made available to the program being audited prior to the audit meeting.

- d. During the audit, the audited program must provide the required documentation for the WCPFC EMP's minimum standards. Any relevant documentation should be provided, preferably in electronic format, though hard copies are acceptable. Note Programs using FFA/SPC documentation available on the SPC website do not need to submit physical copies but should acknowledge their availability.
- e. Flexibility should be shown during the audit, as there may be a number of different methods and ways the required standards can be attained by the program.

### Online Audits

Online Audits can only occur if a program has been previously audited by the Secretariat staff in country, and there has been no change in the structure of the program since the last audit.

Online audit requires the following:

- a. The program advises dates plus times and communication method to be arranged suitable to both parties.
- b. Audit timing of 2/3 days allocated with a timetable produced to indicate breaks and discussion times.
- c. A copy of a previous audit summary, if applicable, plus a copy of the questions on the minimum standards to be asked during the audit, should be made available to the program being audited prior to the online audit meeting.
- d. It would help if the questionnaire sent by the Secretariat to the program prior to the online meeting was filled out as this would cut down on the questions asked.
- e. During the online audit, the audited program must provide the required documentation for the WCPFC EMP' minimum standards. Any relevant documentation should be provided, preferably in electronic format.
- f. Flexibility will be shown during the audit, as there may be several different methods and ways the required standards can be attained by the program.
- g. The final draft summary will be sent to the program to ensure that the person doing the online audit has not misinterpreted the information given by a program.
- h. Changes to the final summary should not deflect from any deficiencies found in the initial audit findings unless it can be proved to have been rectified.

US- The United States would appreciate clarification on the intention of this phrase.

Chair's comments: The only acceptable reason to change the report or remove an initial finding from the "unresolved issues" list in the final report is if the audited organization has taken concrete, verifiable corrective actions to fix the problem, and evidence of this remediation is provided and confirmed by the auditor.

- i. In the case of deficiencies, the program is given 90 days to rectify the deficiency, if program already authorized the program may continue to operate while they rectify the deficiency.

- j. If the deficiency is not rectified after 90 days and no extension of time has been granted to rectify the deficiency. The program may no longer operate as a WCPFC EMP program and therefore coverage by EM from this program is not counted as part of the overall ROP and WCPFC EMP coverage requirements.

Japan- Subparagraphs g-j relate not only to online audits but also to in-person audits. Japan suggests moving them under "Audit procedure" as a common process with following modifications.

g. The final draft summary will be sent to the program to ensure that the person doing the audit has not misinterpreted the information given by a program.

h. Changes to the final summary should not deflect from any deficiencies found in the initial audit findings unless it can be proved to have been rectified.

i. If the deficiency is not rectified the program may no longer operate as a WCPFC EMP program and therefore coverage by EM from this program is not counted as part of the overall ROP and WCPFC EMP coverage requirements.